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KIRSTIN BLAISE LOBATO,

Plaintiff,

V.

LAS VEGAS METROPOLITAN
POLICE DEPARTMENT, NEVADA,
THOMAS THOWSEN, and JAMES
LAROCHELLE,

Defendants.

Case No. 2:19-cv-01273-RFB-EJY

Judge Richard F. Boulware, II

Magistrate Judge Elayna J. Youchah

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND
TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

(Second Request)

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28, 2021, should be extended by three weeks—from August 9, 2021, until and including August 31, 2021. The following grounds constitute good cause:

1. On June 28, 2021, Defendants filed a 77-page motion for summary judgment. ECF No. 67. Pursuant to Local Rule 7-2(b), Plaintiff's response is due on August 9, 2021.

2. Plaintiff's counsel are endeavoring to finish the response by the current deadline and has been working diligently on the facts and the brief. But the issues raised in Defendants' motion are numerous and extensive and the record in this case encompasses tens of thousands of pages.

3. At the same time, Plaintiff's counsel are occupied with time-sensitive matters in several other cases, including a Ninth Circuit brief, a petition for discretionary review to a state supreme court in a criminal case, numerous depositions, expert disclosure deadlines, a *Daubert* motion deadline, a deadline to amend pleadings, and an evidentiary hearing in a post-conviction case. One of Plaintiff's counsel, who has taken the lead in writing the response brief, is also in the process of moving across the country by the end of August.

4. This stipulation is not brought for any improper purpose, but rather to ensure that both sides to this matter are permitted the benefit of appropriate review of relevant evidence and the time to clearly and adequately lay out the issues for the Court's resolution.

5. Plaintiff's counsel have conferred with counsel for Defendants, and the parties have agreed to this extension. Accordingly, Plaintiff and Defendants stipulate that Plaintiff's deadline to respond to Defendants' Motion for Summary Judgment should be extended until August 31, 2021. This stipulation is made in good faith and not for the purpose of delay.

RESPECTFULLY SUBMITTED,

/s/ Elizabeth Wang
One of Plaintiff's Attorneys

/s/ Craig Anderson
One of Defendants' Attorneys

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ORDER

IT IS SO ORDERED that the above Stipulation is hereby GRANTED. Plaintiff shall have until August 31, 2021, to file her response to Defendants' Motion for Summary Judgment.

DATED this 5th day of August 2021.


RICHARD E. BOULWARE, II
United States District Court

CERTIFICATE OF SERVICE

I, Elizabeth Wang, an attorney, hereby certify that on August 5, 2021, I filed the foregoing Stipulation and Proposed Order via CM/ECF, which was electronically delivered to all counsel of record.

/s/ Elizabeth Wang
One of Plaintiff's Attorneys